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**From:** MacNicholl, Peter@DTSC [Peter.MacNicholl@dtsc.ca.gov]  
**Sent:** 2/21/2018 6:36:21 PM  
**To:** Keller, Lynn [Keller.Lynn@epa.gov]  
**Subject:** FW: AEROJET GENERAL CORPORATION - Request for Support

Hi Lynn,

See below. These are DTSC's Eco-Risk comments on the revised HHERA Report.

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**From:** Fendick, Edward@DTSC  
**Sent:** Friday, January 19, 2018 1:05 PM  
**To:** MacNicholl, Peter@DTSC <Peter.MacNicholl@dtsc.ca.gov>  
**Subject:** RE: AEROJET GENERAL CORPORATION - Request for Support

Hi Pete-

Per you EnviroStor request, ERAS has provided a quick-turnaround review of the *Final Human Health and Screening Level Ecological Risk Assessment, Risk to Groundwater Evaluation and Updated Risk Screening for Area 40 Island Operable Unit (OU-7), Volume II of the RI/FS, Aerojet Superfund Site, Sacramento County, California. Final Submitted August 2016, Updated November 2017 (Update Report)*.

The Update Report presents the results of sampling and analysis of soil, soil vapor, and groundwater, conducted after publication of the August 2016 RI/FS. The Update Report incorporates these new data into a revised human health risk assessment, screening-level ecological risk assessment (SLERA), and risk to groundwater evaluation.

ERAS reviewed the Update Report for the changes in the SLERA relative to the August 2016 RI/FS. The predominant changes in the Update Report are a new Section 8 (Remedial Investigation Addendum and Updated Risk Evaluation), as well as revisions in Section 1 (Introduction), Section 9 (Uncertainty Analysis), and Section 10 (HHRA, SLERA, and RTGE Summary). The inclusion into the SLERA of the new sampling results is traceable within the text, tables, and revised figures of the Update Report. The SLERA's conclusion in the Update Report is essentially unchanged from the August 2016 RI/FS's SLERA: identification of the same few final Chemicals of Potential Ecological Concern (COPECs) in sediment, soil, and soil vapor. However, the Update Report's SLERA incorporates additional information from the June 2016 *Draft Feasibility Study for Area 40 Island Operable Unit (OU-7) (FS)*, which has been previously reviewed by ERAS. Consideration of the FS induces the elimination of antimony and molybdenum as COPECs in soil and sediment, but retains dioxins and perchlorate as final COPECs in soil and sediment. The Update Report's SLERA continues to retain 1,1-dichloroethylene, tetrachloroethylene, toluene, and trichloroethylene as final COPECs in soil vapor. These final COPECs will be further evaluated in an updated FS.

In conclusion, ERAS has reviewed the incorporation of new data into the SLERA for Area 40, as documented in the Update Report, and concurs with the SLERA's conclusions and identification of final COPECs.

Lastly, ERAS has two specific comments on the Update Report and recommends that these be addressed in finalization of the Update Report:

- 1) Section 8.3, page 8-21, 1<sup>st</sup> paragraph: The text makes two claims of "it has been determined." These statements must provide references that document these determinations.
- 2) Section 8.3, page 8-22, 2<sup>nd</sup> paragraph: The intended meaning and the conclusion of this paragraph are inferable, but the text is two sentences totaling approximately 150 words. These run-on sentences should be broken into smaller, direct statements. The final few words of the paragraph appear to be a

misstatement, and should instead indicate that perchlorate would **not** be a final COPEC in subsurface soil.

-Ed

Edward A. Fendick, Ph.D.  
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**From:** EnviroStor Help [<mailto:envirostorhelp@ecointeractive.com>]

**Sent:** Thursday, January 18, 2018 12:12 PM

**To:** Polisini, Jim@DTSC <[Jim.Polisini@dtsc.ca.gov](mailto:Jim.Polisini@dtsc.ca.gov)>; Fendick, Edward@DTSC <[Edward.Fendick@dtsc.ca.gov](mailto:Edward.Fendick@dtsc.ca.gov)>; Rohrer, Jim@DTSC <[Jim.Rohrer@dtsc.ca.gov](mailto:Jim.Rohrer@dtsc.ca.gov)>; Beckman, William@DTSC <[William.Beckman@dtsc.ca.gov](mailto:William.Beckman@dtsc.ca.gov)>; MacNicholl, Peter@DTSC <[Peter.MacNicholl@dtsc.ca.gov](mailto:Peter.MacNicholl@dtsc.ca.gov)>; Faulkner, Brian@DTSC <[Brian.Faulkner@dtsc.ca.gov](mailto:Brian.Faulkner@dtsc.ca.gov)>

**Subject:** AEROJET GENERAL CORPORATION - Request for Support

A Shared Service Request has been made by  
*Peter Macnicholl* for HERO-ECO -  
AEROJET GENERAL CORPORATION: [CLICK HERE TO VIEW THE REQUEST](#)

**ACTIVITY INFORMATION:**

**Title:** Human Health & Eco Screening Risk Assessment (RIFS Volume II)

**Document Type:** Risk Assessment Report

**Version:** RP - Draft Final

**Date:** 9/30/2017

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Permitting Project Managers - [Click here to view the request](#)

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